

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION (CLEVELAND)**

**VIRGINIA BARNES**, individually  
and on behalf of all similarly  
situated individuals,

Plaintiffs,

vs.

**THE PROGRESSIVE CORPORATION;  
PROGRESSIVE NORTHERN  
INSURANCE COMPANY; DRIVE  
INSURANCE HOLDINGS, INC; and  
DOES 1-10.**

Defendants.

Case No. 1:17-cv-00865

Hon. Patricia A. Gaughan

**MOTION TO ADMIT DAVID H.  
GROUNDS PRO HAC VICE**

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**MOTION FOR ADMISSION OF DAVID H. GROUNDS  
PRO HAC VICE**

Pursuant to N.D. Ohio Civ. R. 83.5(h), Mark A. DiCello, attorney for Plaintiff, Virginia Barnes, in the above-captioned action, hereby moves the Court to admit David H. Grounds *pro hac vice* to appear and participate as counsel or co-counsel in this case for Plaintiff, and in support of his motion, states as follows:

1. Mr. Grounds has been a member of the bar of the State of Minnesota since October 30, 1998.
2. Mr. Grounds is and has been a member in good standing of the bar of the United States District Court, District of Minnesota since March 1, 2001.
3. Mr. Grounds is and has been a member in good standing of the bar of the United States District Court, District of Colorado since May 5, 2016.

4. Mr. Grounds is and has been a member in good standing of the bar of the United States District Court, Western District of Wisconsin since February 21, 2006.
5. Mr. Grounds is and has been a member in good standing of the bar of the United States Supreme Court since November 1, 2016.
6. Mr. Grounds is a member in good standing in every jurisdiction in which he is admitted to practice.
7. There are no disciplinary proceedings pending against Mr. Grounds as a member of any bar in any jurisdiction.
8. Mr. Grounds is familiar with the Local Rules of the United States District Court for the Northern District of Ohio.
9. In further support of this motion, Mr. Grounds has submitted herewith his Certificate of Good Standing. *See* Exhibit A.
10. Mr. Grounds' relevant identifying information is as follow:

David H. Grounds, Esq.  
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WHEREFORE, the undersigned counsel respectfully moves this Court to admit David H. Grounds *pro hac vice*.

DATE: October 25, 2017

Respectfully Submitted,

/s/ Mark A. DiCello  
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Mark A. DiCello (0063924)  
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*Local Counsel for Plaintiff*

Jacob R. Rusch (MN Bar No. 391892)  
Molly E. Nephew (MN Bar No. 397607)  
David H. Grounds (MN Bar No. 285742)\*

*\*Pro Hac Anticipated*

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*Trial Attorneys for Plaintiff*